REMARKS

Reconsideration and further examination of the subject patent application in light of the present Amendment and Remarks is respectfully requested. Claims 1 and 8-14 are currently pending in the application and stand rejected.

Independent claims 1 and 8 have been amended to point out that the collection of documents searched by the computer-implemented process includes a referencing document and a referenced document referred to in the referencing document by one or more links <u>other than</u> <u>explicit frame references</u>. Thus, in the claimed invention, the referencing document uses one or more links to refer to the referenced document, but does NOT use explicit frame references to do so. Explicit frame references are specifically excluded in the claimed invention, as recited by amended independent claims 1 and 8.

<u>Rejection under 35 U.S.C. §102</u>

Claims 1, 10, and 14 stand rejected under 35 U.S.C. §102(e) as being anticipated by Snyder (US 6,643,641). Applicant respectfully traverses the rejection. The Examiner cites applicant's claimed steps of aggregating, indexing, searching, and returning, and then cites various sections of Snyder as disclosing this subject matter. Applicant disagrees that Snyder describes this subject matter, as discussed below:

I.   Aggregation

The Examiner cites two sections in Snyder as describing applicant's claimed subject matter with respect to the claimed feature of aggregation, namely Snyder Col. 14, lines 22-40 and Col. 24, lines 9-20. Applicant respectfully disagrees that the cited passages teach applicant's claimed aggregation feature for the following reasons:

First, the Examiner cites Col. 14, lines 22-40, which describes a graphic representation of the appearance and rendering of each page at the time the page is indexed. The graphical representation is then stored at a location accessible to search portal processing. However, there is no mention whatsoever of any aggregation process or aggregated document. This portion of Snyder merely discloses that the graphical representation may be stored in the database, which also contains URL addresses of the indexed pages. The cited text explicitly states that:

> The snapshot image files, or URL addresses pointing to the image files, preferably are stored in the database 62 that also contains the URL addresses of the indexed pages (Col. 14, lines 42-45).

Such cited text does not refer to an aggregation process or any type of aggregated documents. Aggregated documents as recited in a claims 1 and 8 are very different than Snyder's graphical representation stored in the database. Applicant respectfully submits that this first cited passage in Snyder does not teach or suggest aggregation in any form.

Second, the Examiner cites Snyder at Col. 24, lines 9-20. Applicant respectfully submits that this cited portion in not relevant to applicant's claimed invention. This exact topic was discussed in detail on page 7 in reply to the Office Action mailed December 28, 2007 and is repeated below. This cited section in Snyder describes the storage of HTML document in a buffer. The complete paragraph in Snyder states that:

> In view of the communication delays and to maintain the pace, it is presently preferred that 32 web agents of type A operate in conduction with each web agent of type B. Thus a plurality of web agents of type A continuously fetch and feed into a buffer or queue all web page files of targeted web pages, including their source code and their graphic images, such as JPG, GIF, Java, Flash, etc., all being stored locally. One or more web agents of type B, preferably one for a number of Agents A (e.g., 32) continuously processes and removes files from this buffer to produce and render one web page snapshot image after another. Concurrently with this process, the text portion of the web page data is indexed or categorized. (Snyder, Col. 20, lines 11-24, emphasis added)

Again, this section cited by the Examiner is silent regarding a referencing document that refers to a referenced document or an aggregation of documents. What this section of Snyder does disclose is that the entire content of a web page is fed into the buffer and concurrently, the text portion of the web page data is indexed or categorized. Thus, this cited text of Snyder is irrelevant because it <u>does not disclose any aggregation</u> of documents prior to indexing. Applicant reiterates that Snyder does not aggregate an internal frame to its corresponding main page because Snyder first begins processing a web page comprising both the main frame and the internal frames. Because both the main frame and the internal frames are present at the beginning of the processing, there is no aggregation.

Note that the Examiner cites Snyder Col. 24, lines 9-20 as disclosing the aggregation of a main frame, which then calls framed pages and the internal framed pages. In other words, the Examiner interprets the cited portion of Snyder as disclosing the aggregation of the multiple documents, which constitute the frame. Moreover, the three paragraphs prior to the cited portion of Snyder (namely, Col. 23, line 38 to Col. 24, line 8), explicitly limit Snyder to the specific case of the framed page. Therefore, even if Snyder did teach an aggregation, which it does not, Snyder would be limited to the specific and particular case of framed pages, which are explicitly excluded in applicant's claims, as amended.

In that regard, the independent claims, as amended, recite that the collection comprises "a referencing document and a referenced document referred to in the referencing document by one or more links other <u>than explicit frame references</u>." This clearly and unambiguously excludes the case wherein the one or more links is an explicit frame reference. As a result, Snyder teaches away from applicant's claimed invention. Accordingly, even if Snyder were somehow interpreted as teaching the aggregation of framed pages, which it clearly does not, Snyder would

certainly not teach any kind of aggregation other that the purported grouping of framed pages. This is not the same as applicant's claimed feature.

II   Indexing

The Examiner also asserts that Col. 14, lines 22-40 of Snyder discloses the claimed feature of indexing the created aggregated document. Applicant respectfully disagrees with the Examiner. Snyder cannot and does not teach or suggest this claimed features because Snyder is completely silent about aggregation of a referencing document and a referenced document referred to in the referencing document by one or more links other than explicit frame references. If the feature of the aggregated document is completely missing, such a "thing" cannot be indexed, and this term is meaningless within the context of Snyder.

III   Returning

The Examiner further asserts that Col. 14, lines 41-50 of Snyder discloses the claimed feature of returning the allocated aggregate document. Applicant respectfully disagrees with the Examiner. As indicated above, because Snyder is completely silent about aggregation of a referencing document and a referenced document, it does not and cannot disclose the claimed feature of returning a located aggregate document. Again, this term is meaningless within the context of Snyder.

IV   Summary

Accordingly, applicant submits that at least several important elements of applicant's claimed invention are missing from Snyder, and thus Snyder cannot anticipate independent claims 1 or 8. Therefore, applicant respectfully submits that independent claims 1 or 8 are allowable. Applicant further submits that dependent claims 9 are 14 are allowable as depending from allowable base claims, respectively.

Claims 8 and 9 stand rejected under 35 U.S.C. §103 as being unpatentable over Snyder in light of Bourdoncle (2002/005894). Claims 11 and 13 stand rejected under 35 U.S.C. §103 as being unpatentable over Snyder in light of Google-Hacks (Article). Applicant respectfully traverses this rejection. Applicant reasserts that above arguments made under §102 to traverse the rejection under §103.

Snyder is completely deficient because it is missing several important elements of applicant's claimed invention, such as the process of aggregating the documents and indexing the document after aggregation. Further, Snyder does not teach or suggest that the collection of documents includes a referencing document and a referenced document referred to in the referencing document by one or more links other than explicit frame references. Similarly, Bourdoncle is missing this and other claimed elements of applicant's invention. Accordingly, combining Snyder with Bourdoncle still does not arrive at applicant's claimed invention because the combination is still deficient regarding the missing claimed elements. Neither Bourdoncle nor Google-Hacks teach or suggest the elements missing from the primary reference to Snyder. Accordingly, applicant submits that the combination of Snyder, Bourdoncle, and/or Google-Hacks does not, and cannot teach or suggest applicant's claimed invention.

<u>Closing Remarks</u>

Pending claims 1 and 8-14 are believed to be patentable. Applicant respectfully requests the Examiner grant early allowance of this application. The Examiner is invited to contact the undersigned attorneys for the applicant via telephone if such communication would expedite this application.

Respectfully submitted,

/Eric. D. Cohen/
Registration No. 38,110
Eric D. Cohen
Attorney for Applicant

BRINKS HOFER GILSON & LIONE
P.O. BOX 10395
CHICAGO, ILLINOIS 60610
(312) 321-4200